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10 Attorneys for Defendants
SPORTS MEDIA SERVICES, LLC
11 (ERRONEOUSLY NAMED AND
SERVED AS FOX CORPORATION),
12 FOX SPORTS HOLDINGS, LLC,
FOX SPORTS 1, LLC, FOX SPORTS
13 2, LLC, and FOX SPORTS
PRODUCTIONS, LLC

14 UNITED STATES DISTRICT COURT
15
16 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

17 NOUSHIN FARAJI, individually, and
18 on behalf of others similarly situated,

19 Plaintiff,

20 v.

21 FOX CORPORATION, a Delaware
corporation, FOX SPORTS
22 HOLDINGS, LLC, a Delaware limited
liability company, FOX SPORTS 1,
23 LLC, a Delaware limited liability
company, FOX SPORTS 2, LLC, a
24 Delaware limited liability company,
FOX SPORTS PRODUCTIONS, LLC,
25 a Delaware limited liability company,
CHARLIE DIXON, an individual,
26 SKIP BAYLESS, an individual, JOY
TAYLOR, an individual, and DOES 1-
27 25, inclusive,

28 Defendants.

Case No.
LASC Case No. 25STCV00101

**DECLARATION OF MICHAELA R.
GOLDSTEIN IN SUPPORT OF
DEFENDANT SPORTS MEDIA
SERVICES, LLC'S
(ERRONEOUSLY NAMED AND
SERVED AS FOX CORPORATION)
NOTICE OF REMOVAL**

*[Filed Concurrently with: Notice of
Removal of Action; Corporate
Disclosure Statement; Notice of
Interested Parties; and Declaration of
Joy Dumlao in support of Defendant's
Notice of Removal of Action]*

Complaint Filed: January 3, 2025
Trial Date: None Set

DECLARATION OF MICHAELA R. GOLDSTEIN

I, Michaela R. Goldstein, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am an associate with Sheppard, Mullin, Richter & Hampton LLP, attorneys of record for Defendant Sports Media Services, LLC (erroneously named and served as Fox Corporation) (“Sports Media”) in the above-referenced action. I am one of the attorneys primarily responsible for managing the defense of this action on behalf of Sports Media, and I am personally familiar with the pleadings filed in this action and my firm’s files for this matter. If called as a witness, I could and would competently testify to all facts within my personal knowledge except where stated upon information and belief.

2. A true and correct copy of the proposed class action summons and complaint (“Complaint”) filed on behalf of Plaintiff Noushin Faraji against Sports Media in the Superior Court of the State of California, County of Los Angeles, which initiated Case No. 25STCV00101 (“State Court Action”) is attached hereto and marked “**Exhibit C.**”

3. On January 7, 2025, Sports Media (erroneously named and served as Fox Corporation) was served with Plaintiff’s Complaint by personal service. A true and correct copy of the Proof of Service for Sports Media is attached hereto and marked “**Exhibit D.**”

4. A true and correct copy of Sports Media’s Answer to Plaintiff’s Complaint which Sports Media filed in the State Court Action on February 4, 2025 is attached hereto and marked “**Exhibit E.**”

5. On January 29, 2025, Sports Media was served with an Initial Status Conference Order and Minute Order in the State Court Action. A true and correct copy of these Orders is attached hereto and marked “**Exhibit F.**”

